IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DR. PAM ADAMSON, WANDA SMITH, OPHELIA BURROUGHS, MARY BAKER, DR. ALIEKA ANDERSON and CHARLTON BIVINS, in their official capacities as members of the Clayton County Board of Education and individually as residents and voters in the Clayton County School District,	:	CIVIL ACTION
Plaintiffs,	:	FILE NO. 1:12-CV-1665-CAP
v.	:	
CLAYTON COUNTY ELECTIONS AND REGISTRATION BOARD, ROBERT P. BOLIA, PATRICIA PULLAR, RUTH F. ASH, VIVIAN BALDWIN AND JIM CONSTABLE, in their official capacities as members of the Clayton County Elections and Registration Board,	:	
Defendants.	:	

AFFIDAVIT

STATE OF GEORGIA

COUNTY OF COBB

EXHIBIT "C"

Personally appeared before the undersigned attesting officer authorized to administer oaths, Mark Oestreich, who, after being duly sworn, on oath deposes and says:

1.

My name is Mark Oestreich. I am employed by the law firm of Brock, Clay, Calhoun and Rogers, LLC ("BCCR") as a Network Administrator. I am competent to make this affidavit, and this affidavit is based upon my personal knowledge.

2.

As part of my employment with BCCR, I was tasked with assisting in the preparation of a new map for the districts for the Clayton County Board of Education ("BOE") based on data from the 2010 decennial Census. I understand that the current BOE voting districts are not drawn based on the 2010 decennial Census data and, instead, are the voting districts that have existed since the early 2000's.

3.

BCCR has a software package called *Caliper Maptitude for Redistricting* (hereinafter referred to as "Maptitude"), which is the same software package utilized by the Georgia General Assembly to draw voting district lines.

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4.

In order to assist the BOE to prepare a map with new voting district lines based upon the 2010 decennial Census data, BCCR purchased the 2010 decennial Census data from Caliper, the company that created Maptitutde, for Clayton County and I uploaded that data to Maptitude.

5.

Attached hereto as Exhibit "1" is a chart based on the data BCCR purchased. Exhibit "1" shows population data based on 2010 Census figures for the current BOE voting districts. The data contained in Exhibit "1" came from the 2010 decennial Census data BCCR purchased and which I uploaded to Maptitude.

6.

Attached hereto as Exhibit "2" is a chart based on the 2010 Census figures for the BOE voting districts as proposed by certain members of the BOE. The data contained in Exhibit "2" came from the 2010 decennial Census data BCCR purchased and which I uploaded to Maptitude.

7.

As part of assisting the BOE with its proposed new voting districts, I used Maptitude to create a new voting district map, which is a file entitled "claytonsb-

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import-01202012.". A true and accurate copy of the proposed new map is attached hereto as Exhibit "3."

8.

I have relied upon my personal knowledge of the transaction at issue in this case in making this Affidavit.

Sworn to and subscribed
before me this 7th day
of June, 2012.

CYNTHIA JAN CURTIS NOTARY PUBLIC COBB COUNTY, GA MY COMMISSION EXPIRES APRIL 12, 2016

Notary Public

Mark Oestreich, Affiant

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2010 POPULATIONS UNDER EXISTING DISTRICTS

District	Pop.	18+ Pop.	Ideal Value	Deviation	% Deviation
1	37680	26640	28825	8855	30.72%
2	30158	20843	28825	1333	4.62%
3	26606	19402	28825	-2219	-7.70%
4	21602	15355	28825	-7223	-25.06%
5	24622	17237	28825	-4203	-14.58%
6	32066	23738	28825	3241	11.24%
7	25448	17732	28825	-3377	-11.72%
8	26914	19200	28825	-1911	-6.63%
9	34328	24298	28825	5503	19.09%

District	White	% White	18+ White	% 18+ White	Black	% Black	18+ Black	% 18+ Black
1	8973	23.81%	7374	19.57%	24772	65.74%	16856	44.73%
2	3023	10.02%	2418	8.02%	23833	79.03%	16420	54.45%
3	1840	6.92%	1622	6.10%	22458	84.41%	16245	61.06%
4	3003	13.90%	2421	11.21%	14497	67.11%	10147	46.97%
5	4703	19.10%	3805	15.45%	16235	65.94%	11058	44.91%
6	8073	25.18%	6999	21.83%	20629	64.33%	14509	45.25%
7	7345	28.86%	5547	21.80%	11236	44.15%	7702	30.27%
8	5494	20.41%	4403	16.36%	15011	55.77%	10529	39.12%
9	6506	18.95%	5257	15.31%	22809	66.44%	15752	45.89%

District	Hispanic	% Hispanic	18+ Hispanic	% 18+ Hisp.	Asian	% Asian	18+ Asian	% 18+ Asian
1	4286	11.37%	2595	6.89%	864	2.29%	635	1.69%
2	3349	11.10%	1962	6.51%	686	2.27%	518	1.72%
3	1209	4.54%	767	2.88%	1080	4.06%	794	2.98%
4	4031	18.66%	2615	12.11%	930	4.31%	721	3.34%
5	3739	15.19%	2298	9.33%	876	3.56%	691	2.81%
6	2363	7.37%	1543	4.81%	1540	4.80%	1172	3.66%
7	7716	30.32%	4710	18.51%	2375	9.33%	1808	7.10%
8	4653	17.29%	2899	10.77%	2658	9.88%	1967	7.31%
9	4101	11.95%	2442	7.11%	1928	5.62%	1459	4.25%

EXHIBIT "1"

2010 POPULATIONS UNDER PROPOSED DISTRICTS

District	Pop.	18+ Pop.	Ideal Value	Deviation	% Deviation
1	28291	20228	28825	-534	-1.85%
2	28954	19843	28825	129	0.45%
3	28316	20256	28825	-509	-1.77%
4	29009	20764	28825	184	0.64%
5	29011	20059	28825	186	0.65%
6	28837	21828	28825	12	0.04%
7	28353	20172	28825	-472	-1.64%
8	29353	20570	28825	528	1.83%
9	29300	20725	28825	475	1.65%

District	White	% White	18+ White	% 18+ White	Black	% Black	18+ Black	% 18+ Black
1	6700	23.68%	5696	20.13%	19187	67.82%	12992	45.92%
2	3762	12.99%	2916	10.07%	22242	76.82%	15169	52.39%
3	2602	9.19%	2151	7.60%	22168	78.29%	15860	56.01%
4	3249	11.20%	2639	9.10%	21375	73.68%	15153	52.24%
5	5363	18.49%	4332	14.93%	19537	67.34%	13089	45.12%
6	7890	27.36%	6866	23.81%	17828	61.82%	12900	44.73%
7	7996	28.20%	6124	21.60%	12785	45.09%	9025	31.83%
8	5133	17.49%	4070	13.87%	19317	65.81%	13283	45.25%
9	6265	21.38%	5052	17.24%	17041	58.16%	11747	40.09%

District	Hispanic	% Hispanic	18+ Hispanic	% 18+ Hisp.	Asian	% Asian	18+ Asian	% 18+ Asian
1	2287	8.08%	1519	5.37%	637	2.25%	472	1.67%
2	3249	11.22%	1836	6.34%	648	2.24%	502	1.73%
3	2888	10.20%	1717	6.06%	1155	4.08%	834	2.95%
4	4200	14.48%	2732	9.42%	1021	3.52%	792	2.73%
5	4104	14.15%	2521	8.69%	949	3.27%	753	2.60%
6	2148	7.45%	1395	4.84%	1485	5.15%	1112	3.86%
7	8044	28.37%	4940	17.42%	2789	9.84%	2139	7.54%
8	4300	14.65%	2630	8.96%	1510	5.14%	1127	3.84%
9	4227	14.43%	2541	8.67%	2743	9.36%	2034	6.94%

EXHIBIT "2"

Clayton County, Georgia
Proposed School Board

client: clayton sb
type: local
plan: claytonsb-import-01202012

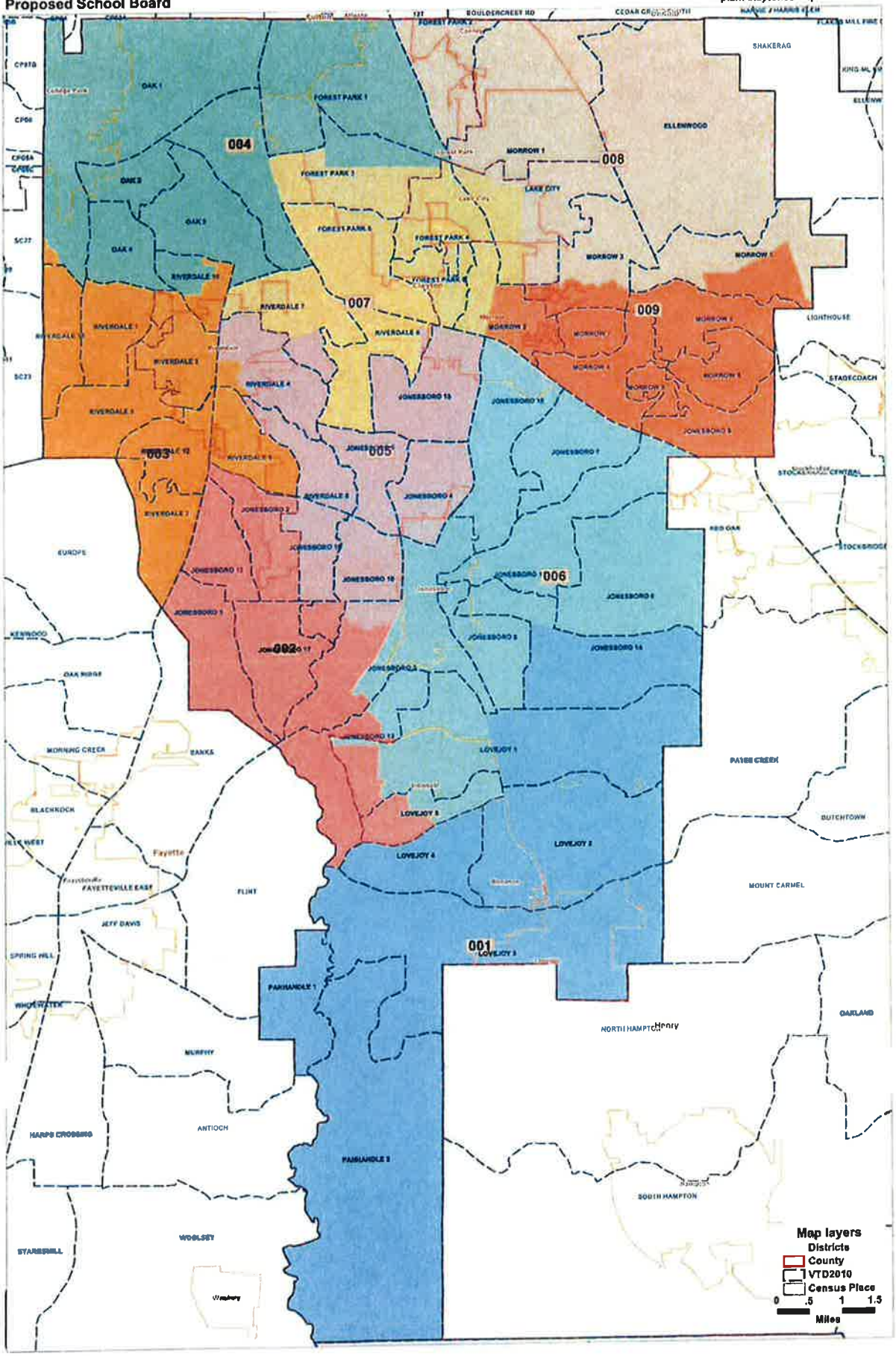

EXHIBIT "3"